

United States District Court  
Southern District Of Texas  
FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

JUN 16 2020

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

DOMINGA LEDESMA

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§  
§  
§

Criminal No. M-19-2328-S1

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about June 28, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant

**DOMINGA LEDESMA**

knowingly used, without lawful authority, a means of identification of another person, that is a Social Security account number xxx-xx-7333 assigned to L.F.R., during and in relation to a felony violation of Title 42, United States Code, Section 408(a)(8), knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(11).

Count Two

On or about June 28, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant

**DOMINGA LEDESMA**

did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5331, and the regulations promulgated thereunder, cause and attempt to cause a nonfinancial trade or business, that is, Brittany's Boutique, to file a report required by Title 31, United States Code, Section 5331, that is Form 8300, that contained a material omission and

misstatement of fact, that is, by reporting that L.F.R., with social security number xxx-xx-7333, had provided, through the conduct of another person, more than \$10,000 in United States currency or coin in one transaction for the purchase of silver pellets when in truth and in fact, L.F.R. had been deceased since 2017.

In violation of Title 31, United States Code, Sections 5324(b) and 5324(d)(2), and Title 18, United States Code Section 2.

**Count Three**

On or about July 10, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant

**DOMINGA LEDESMA**

knowingly used, without lawful authority, a means of identification of another person, that is a Social Security account number xxx-xx-7333 assigned to L.F.R., during and in relation to a felony violation of Title 42, United States Code, Section 408(a)(8), knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(11).

**Count Four**

On or about July 10, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant

**DOMINGA LEDESMA**

did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5331, and the regulations promulgated thereunder, cause and attempt to cause a nonfinancial trade or business, that is, Brittany's Boutique, to file a report required by Title 31, United States Code, Section 5331, that is Form 8300, that contained a material omission and misstatement of fact, that is, by reporting that L.F.R., with social security number xxx-xx-7333,

had provided, through the conduct of another person, more than \$10,000 in United States currency or coin in one transaction for the purchase of silver pellets when in truth and in fact, L.F.R. had been deceased since 2017.

In violation of Title 31, United States Code, Sections 5324(b) and 5324(d)(2), and Title 18, United States Code Section 2.

**Count Five**

On or about September 13, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant

**DOMINGA LEDESMA**

knowingly used, without lawful authority, a means of identification of another person, that is a Social Security account number xxx-xx-7333 assigned to L.F.R., during and in relation to a felony violation of Title 42, United States Code, Section 408(a)(8), knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(11).

**Count Six**

On or about September 13, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant

**DOMINGA LEDESMA**

did knowingly and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5331, and the regulations promulgated thereunder, cause and attempt to cause a nonfinancial trade or business, that is, Brittany's Boutique, to file a report required by Title 31, United States Code, Section 5331, that is Form 8300, that contained a material omission and misstatement of fact, that is, by reporting that L.F.R., with social security number xxx-xx-7333, had provided, through the conduct of another person, more than \$10,000 in United States currency

or coin in one transaction for the purchase of silver pellets when in truth and in fact, L.F.R. had been deceased since 2017.

In violation of Title 31, United States Code, Sections 5324(b) and 5324(d)(2), and Title 18, United States Code Section 2.

**Count Seven**

On or about July 31, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant

**DOMINGA LEDESMA**

did knowingly possess or use without lawful authority, a means of identification of another person, that is a Social Security account number xxx-xx-7333 assigned to L.F.R., knowing that the means of identification belonged to another actual person, with intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, namely to cause or attempt to cause a nonfinancial trade or business to file a report required under section 5331 that contains a material omission or misstatement of fact, in violation of Title 31, United States Code, Section 5324(b)(2) and such conduct was in and affected interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 1028(b)(2)(B).

**Count Eight**

On or about August 2, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant

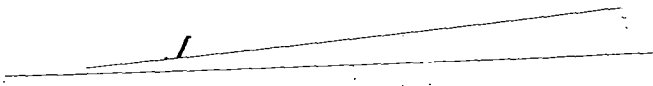
**DOMINGA LEDESMA**

did knowingly possess or use without lawful authority, a means of identification of another person, that is a Social Security account number xxx-xx-7333 assigned to L.F.R., knowing that the means of identification belonged to another actual person, with intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, namely to cause

or attempt to cause a nonfinancial trade or business to file a report required under section 5331 that contains a material omission or misstatement of fact, in violation of Title 31, United States Code, Section 5324(b)(2) and such conduct was in and affected interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 1028(b)(2)(B).

A TRUE BILL

  
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FOREPERSON

RYAN K. PATRICK  
UNITED STATES ATTORNEY

  
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ASSISTANT UNITED STATES ATTORNEY